

THE HONORABLE RICARDO S. MARTINEZ

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

TAMARA LOHR and RAVIKIRAN SINDOGI,  
on behalf of themselves and all others similarly  
situated,

Plaintiffs,

v.

NISSAN NORTH AMERICA, INC., and  
NISSAN MOTOR CO., LTD.,

Defendants.

Case No. 2:16-cv-01023-RSM

**STIPULATION AND ORDER REGARDING  
DEFENDANT NISSAN NORTH AMERICA,  
INC.'S BILL OF COSTS**

Plaintiffs Tamara Lohr and Ravikiran Sindogi ("Plaintiffs") and Defendant Nissan North America, Inc. ("NNA") (collectively, the "Parties") enter into this stipulation with reference to the following facts and recitals:

On May 16, 2022, this Court granted summary judgment in favor of NNA (Dkt. 211).

On October 12, 2022, and pursuant to Federal Rule of Civil Procedure 54(d) and Western District of Washington Local Court Rule 54(d), NNA filed a motion for costs (Dkt. 218).

The Parties met and conferred regarding their previous agreement to consolidate discovery in this action along the *Johnson, et al. v Nissan North America, Inc.* matter, a related case venued in the Northern District of California, No. 3:17-cv-00517-WHO.

The Parties now seek to resolve the issue of NNA's attorney's fees, costs and expenses without further litigation on terms just and fair to all parties and hereby enter into the following Stipulation of Attorney's Fees, Costs and Expenses ("the Stipulation").

THEREFORE, THE PARTIES HEREBY STIPULATE TO THE ENTRY OF AN ORDER AS FOLLOWS:

1. That Plaintiff shall pay the sum of \$18,062.74<sup>1</sup> in costs and expenses in a check made payable to Shook, Hardy & Bacon L.L.P. and NNA hereby agrees to accept said payment in full satisfaction of all claims for costs and expenses in connection with this action;

IT IS SO STIPULATED.

Dated: October 31, 2022

/s/ Mitchell M. Breit

On Behalf of Plaintiffs

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/s/ Amir Nassihi

On Behalf of Defendant  
Nissan North America, Inc.

Amir M. Nassihi, appearance *pro hac vice*  
Andrew L. Chang, appearance *pro hac vice*  
H. Grant Law, appearance *pro hac vice*  
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<sup>1</sup> This amount represents \$17,662.74 in transcript costs, which represent half of those sought with the understanding that the other half would be recoverable to the prevailing party in the related *Johnson* matter, and \$400 in docket fees incurred in this action.

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Holly Pauling Smith, appearance *pro hac vice*  
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**ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: November 1, 2022.



RICARDO S. MARTINEZ  
UNITED STATES DISTRICT JUDGE